

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ANN JONES, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

BLOOMINGDALES.COM, LLC,

Defendant.

Civil Case No. 4:22-CV-01095-SEP

**DECLARATION OF MATTHEW Q. VERDIN IN SUPPORT OF DEFENDANT
BLOOMINGDALES.COM, LLC'S MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT**

I, Matthew Q. Verdin, declare as follows:

1. I am an attorney at the law firm of Covington & Burling LLP and counsel of record for Defendant Bloomingdales.com, LLC in this action.

2. Attached as **Exhibit A** is a true and correct copy of the Business Information webpage for FullStory, Inc., from the Georgia Secretary of State's website, available at <https://ecorp.sos.ga.gov/BusinessSearch/BusinessInformation?businessId=1741233&businessType=Foreign%20Profit%20Corporation&fromSearch=True> (last accessed February 14, 2023).

3. Attached as **Exhibit B** is a true and correct copy of Bloomingdale's privacy policy, dated June 2021, which was captured using the Internet Archive's Wayback Machine, available at <https://web.archive.org/web/20221012184743/http://customerservice-bloomingdales.com/articles/bloomingdales-and-bloomingdalescom-notice-of-privacy-practices/>.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on February 16, 2023 in Oakland, California.



MATTHEW Q. VERDIN